



1 September or for October 20, 2010. In particular, Debtor has substantial disputes with this  
2 creditor's claim as well as the priority claim of the IRS and these disputes should be  
3 addressed pre-confirmation.

4 3) As to this objecting creditor, Debtor has disputes related to the mortgage itself.  
5 The mortgage was incurred without his knowledge or consent by Angela Bostwick alone.  
6 He has various legal claims to pursue including but not limited to those against the Notary  
7 Public, Escrow, and/or lender. He was previously working with James Connolly and then  
8 Jonathan Sprouffske of the Olympia law firm Connolly, Tacon, and Meserve. Mr. Sprouffske  
9 has been employed as special counsel by the bankruptcy court. Mr. Sprouffske has recently  
10 informed he will not be able to assist Mr. Bostwick due to the need to cover Mr. Connolly's  
11 caseload. Mr. Bostwick is now working to find substitute special counsel and has been  
12 communicating with attorney David Smith of Tacoma.

13 4) Debtor will object to the claim of JP Morgan Chase Bank, National Association,  
14 however an adversary proceeding may prove necessary and Debtor needs to obtain  
15 replacement special counsel to pursue litigation.

16 **WHEREFORE** Debtor requests that the Court continue the creditor's objection to  
17 confirmation for four (4) months for Debtor to then provide a status update to the Court  
18 regarding Debtor's progress in his pending claims disputes and for replacement special  
19 counsel to have been employed for Debtor to pursue his legal claims related to the  
20 objecting creditor's underlying debt.

21 **DATED** this 6th day of August, 2010.

22 /s/Kathleen Shoemaker  
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24 Of Attorneys for Debtors

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